

In its Form 381 for WDSU-DT (File No. BCERCT-20041105ABG), filed prior to Hurricane Katrina, Hearst certified to post-transition operation pursuant to its allotted replication facility. Following the hurricane damage, Hearst is now working on the design of a new transmission facility, which may involve the co-location of other New Orleans stations and require modifications to WDSU-DT's proposed operating parameters. Hearst's rebuilding project will assist in New Orleans' renewal as a community.

Accordingly, Hearst hereby notifies the Commission that, despite its Form 381 replication certification, Hearst will likely need to modify WDSU-DT's transmission facility as a result of damage caused by Hurricane Katrina.

**N. Additional Antenna ID Discrepancies**

For each of the following stations, Hearst is unable to confirm or deny the accuracy of the Antenna ID referenced in Appendix B:

<b>Station</b>	<b>Appendix B Antenna ID</b>
KSBW-DT, Salinas, CA Facility ID No. 19653	70343
KHVO-DT, Hilo, HI Facility ID No. 64544	74413
KMAU-DT, Wailuku, HI Facility ID No. 64551	75008
KCCI-DT, Des Moines, IA Facility ID No. 33710	74490
KMBC-DT, Kansas City, MO Facility ID No. 65686	74967
KOAT-DT, Albuquerque, NM Facility ID No. 53928	74445
KOVT-DT, Silver City, NM Facility ID No. 53911	74976
WBAL-DT, Baltimore, MD Facility ID No. 65696	74686
WMTW-DT, Poland Spring, ME Facility ID No. 73288	74574
WYFF-DT, Greenville, SC Facility ID No. 53905	74692

<b>Station</b>	<b>Appendix B Antenna ID</b>
WMUR-DT, Manchester, NH Facility ID No. 73292	74688

With the exception of WYFF-DT, each of the above stations has a TCD for its respective current analog channel. WYFF-DT's TCD is neither its current DTV nor its current analog channel. Hearst requests that the Commission ensure that all antenna identification numbers reflect accurate parameters. In addition, Hearst requests that Antenna ID's identified in Appendix B not be used by the Commission to limit or affect a digital facility's operating parameters.

## II. KCWE LMA, Inc.

KCWE LMA, Inc., licensee of KCWE-DT, Kansas City, Missouri (Facility ID No. 64444), notes that there is no Antenna ID listed in Appendix B for KCWE-DT. The Commission's CDBS database indicates that the Antenna ID for KCWE-DT's operation pursuant to BLCDT-20051014ABT is 41769, although Hearst is unable to confirm the accuracy of that identification number. File No. BLCDT-20051014ABT covered File No. BMPCDT-20011127AAT, and that latter file number is the certified facility in the KCWE-DT Form 381 (File No. BCERCT-20041104AFZ) and authorizes operation on KCWE-DT's TCD.

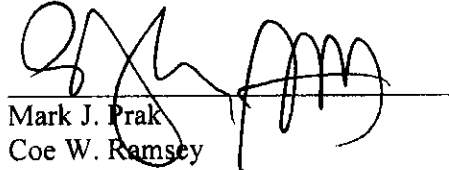
## III. WMOR-TV Company

WMOR-TV Company, licensee of WMOR-DT, Lakeland, Florida (Facility ID No. 53819), notes that there is no Antenna ID listed in Appendix B for WMOR-DT. The Commission's CDBS database indicates that the Antenna ID for WMOR-DT's operation pursuant to BLCDT-20050726ABO is 43395, although Hearst is unable to confirm the accuracy

of that identification number. File No. BLCDT-20050726ABO covered File No. BMPCDT-20012201AAK, and that latter file number is the certified facility in the WMOR-DT Form 381 (File No. BCERCT-20041105ABN) and authorizes operation on WMOR-DT's TCD.

Respectfully submitted,

**HEARST-ARGYLE TELEVISION, INC.,  
KCWE LMA, INC., and WMOR-TV  
COMPANY**

A handwritten signature in black ink, appearing to be 'Mark J. Prak', written over a horizontal line.

Mark J. Prak

Coe W. Ramsey

Stephen Hartzell

Brooks, Pierce, McLendon,

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Their Attorneys

January 25, 2007

Exhibit 1  
(WGAL-DT Engineering Statement)

**Engineering Statement**  
in support of  
**COMMENTS in MB DOCKET 87-268**  
prepared for  
**WGAL Hearst-Argyle Television, Inc.**  
WGAL(TV) Lancaster, Pennsylvania  
Facility ID 53930

This engineering statement has been prepared on behalf of *WGAL Hearst-Argyle Television, Inc.* ("*Hearst-Argyle*"), licensee of WGAL(TV) (Facility ID 53930, Lancaster, PA) in support of *Comments* being filed in the Seventh Further Notice of Proposed Rulemaking ("FNPRM"), Media Bureau Docket 87-268.<sup>1</sup> The subject docket sets forth a proposed new digital television ("DTV") allotment table for the post-transition period. A Tentative Channel Designation ("TCD") is listed in Appendix B of the FNPRM for each eligible television station. *Hearst-Argyle* requests herein that alternative technical parameters be employed for the WGAL TCD.

The FNPRM (§ 28-29) allows qualifying licensees to propose a change in their certified technical parameters. *Hearst-Argyle* herein proposes that replication parameters be employed in place of maximized parameters for WGAL's TCD.

**Discussion - Background**

The licensed WGAL analog facility is on Channel 8 (BLCT-19981009KE) and its digital operation is licensed on Channel 58 (BLCDT-20010621ABF). The present digital channel is not within the core (Ch. 2-51). *Hearst-Argyle* successfully elected WGAL's analog Channel 8 in the first round of channel elections (see BFRECT-20050210ALN).

The technical parameters for the current Channel 8 TCD are based upon *Hearst-Argyle*'s pre-election certification on Form 381 (BCERCT-20041105ABI). The certification specifies that the post-transition DTV facility will be operated at maximized facilities as authorized by its current Channel 58 facility license (BLCDT-20010621ABF). The licensed facility involves an effective radiated power ("ERP") of 907 kW with a directional antenna at 393 meters height above average terrain ("HAAT"). The licensed Channel 58 antenna is side-mounted on the same tower as the

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<sup>1</sup>*Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 06-150, released October 20, 2006.

**Engineering Statement**  
(page 2 of 6)

analog WGAL facility. The underlying "replication" allotment for WGAL's digital Channel 58 provides for 382.7 kW ERP at 415 meters antenna HAAT (the top-mount antenna location).

The current TCD "carries over" to Channel 8 the licensed DTV operation on Channel 58 including the side-mount antenna height and the cardioid directional pattern. The TCD's ERP is 13.4 kW at 393 meters antenna HAAT. These parameters are based on *Hearst-Argyle's* pre-election certification of the maximized WGAL facility.

If a "replication" facility had been carried over, the ERP would be 5.36 kW at 415 meters HAAT, based on the top-mount antenna position of the 1997 analog baseline facility. Since that 1997 facility was non-directional, a "replication" allotment to DTV operation on Channel 8 would specify a fairly non-directional antenna pattern (there would be minor variations due to the 90 percent availability factor in the FCC's propagation curves for DTV).

The attached **Figure 1** provides a contour comparison map of the "maximization" (13.4 kW / 393 meter) and the "replication" (5.36 kW / 415 meter) facilities. The "maximization" facility contour extends beyond the "replication" contour over approximately half of the service area (to the northwest), while it falls short of replication to the southeast. Contour extension by the maximized Channel 58 facility could not be achieved in some directions due to interference protection requirements to other stations. Plots inset on the map depict the directional antenna patterns.

In its FCC Form 381 pre-election certification, *Hearst-Argyle* selected "maximization" based principally on the "use it or lose it" criteria discussed in MB Docket 03-15<sup>2</sup>. WGAL is a network affiliate (NBC) in a top 100 market (Harrisburg-Lancaster, PA). The "use it or lose it" criteria would have required WGAL to achieve a 100 percent population match with its Channel 58 facility in order to maintain interference protection to, and carry-over of, the full replication facility (FCC 04-192, ¶ 78). Although "maximized," as shown in following table the WGAL-DT licensed Channel 58 facility provides 88.2 percent population match and therefore falls short of the 100 percent

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<sup>2</sup> *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket 03-15, FCC 04-192, released September 7, 2004.

### Engineering Statement

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requirement for full carry-over of its replication facility. Thus, *Hearst-Argyle* selected the licensed "maximized" facility for the basis of its post-transition operation.

#### WGAL-DT Population Match Determination<sup>3</sup>

<u>WGAL(TV) Facility</u>	<u>ERP/HAAT</u>	<u>Interference-Free Service Population (2000 Census)</u>	<u>Percent match of Target</u>
NTSC Ch. 8 (1997 baseline facility)	112 kW / 415 m	3,098,722	--
DTV Ch. 58 Allotment	383 kW / 415 m	3,189,067	--
DTV Ch. 58 Licensed (maximized)	907 kW / 393 m	2,734,508	88.2%

#### **Proposed Change in Certified Facilities**

A directional antenna on Channel 8 would have to be obtained in order to fulfill the current TCD parameters. As a practical matter, *Hearst-Argyle* seeks to employ the existing non-directional top-mounted Channel 8 antenna for its post-transition digital facility. Avoiding the need to replace the antenna would save considerable financial resources as *Hearst-Argyle* will already be forced to abandon its Channel 58 facilities which are not in the core. Use of the replication parameters for carry-over to Channel 8 would facilitate a final digital allotment that is nearly non-directional and could easily be fulfilled with the current non-directional Channel 8 antenna system.

The FNPRM states that a change in certified facilities may be sought by those stations who have received authorization to extend their service beyond their certified areas. Here, a replication facility is contemplated for which *Hearst-Argyle* could obtain authorization as a "checklist" facility at any time in full compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.<sup>4</sup> As shown in **Figure 1**, the replication parameters would extend service beyond the area which was certified. Thus it is believed that WGAL does qualify for the change in certification facility.

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<sup>3</sup>Interference-free service population is population within contour less population subject to terrain blockage and interference per FCC OET Bulletin 69. Target population for "Percent Match" is the smaller of the 1997 NTSC facility and DTV allotment.

<sup>4</sup>Public Notice "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes," DA 04-2446, released August 3, 2004.



**Engineering Statement**

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Technical parameters sought herein are summarized in the attached **Schedule B** ("Tech Box") of FCC Form 383 (conflict decision facility data).<sup>5</sup> In compliance with the FNPRM, the proposed change in certification does not result in interference in excess of 0.1 percent to any other licensee's TCD. The results of an engineering interference analysis per OET Bulletin 69<sup>6</sup> are supplied in **Table 1**, and demonstrate that interference does not exceed the 0.1 percent limit.

The engineering analysis was conducted using the same methodology that the Commission's staff employed to identify conflicts during the three election rounds, as described in the following text from the FNPRM (§ 21):

"New interference to post-transition DTV operations was defined as interference beyond that caused by existing analog and DTV operations, as set forth in the certification database information. . . . In performing conflict analyses, the staff applied the standard that an interference conflict exists when it was predicted that more than 0.1 percent new interference would be caused to another station."

Although the instant proposal complies with the 0.1 percent limit, it is noted that the Commission's channel election procedure contemplates allowing stations with no core DTV channel to create more than 0.1 percent interference. In the first round, these stations seeking replication on their NTSC core channel (such as WGAL) were permitted to cause up to 2.0 percent interference to other stations. Thus, it is believed that the proposed change in WGAL certification facility easily complies with the interference criteria.

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<sup>5</sup>These parameters should correspond closely to replication parameters which might be computed by Commission Staff. If necessary, Commission Staff's replication parameters can be employed in lieu of these values. Note that "replication" antenna make and model data, as well as beamtilt information, for the proposed TCD parameters are provided as generic in the Tech Box since final data will be provided at the Construction Permit "application" stage.

<sup>6</sup> FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed with 2000 Census data. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

**Engineering Statement**  
(page 5 of 6)

It is acknowledged that in seeking the modified parameters, *Hearst-Argyle* will accept interference from any other TCD already approved. The service and interference statistics for the present and proposed WGAL Channel 8 TCD are summarized below. As a matter of public interest, the WGAL-DT post-transition interference-free service population will increase by 23.9 percent to 4,104,345 persons.

	<u>Present TCD</u>	<u>Proposed TCD</u>
Service Area (sq. km)	23,701.7	24,465.1
Service Population (2000 census)	3,313,004	4,104,345
Interference	2.55 %	3.54 %

**Class A Station Protection**

No new interference to any authorized Class A Television station will result from this proposal.

**Conclusion**

WGAL's "replication" technical parameters are proposed to be substituted in lieu of "maximization" parameters. Interference to other stations does not exceed 0.1 percent.

**Engineering Statement**  
(page 6 of 6)

**Certification**

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.



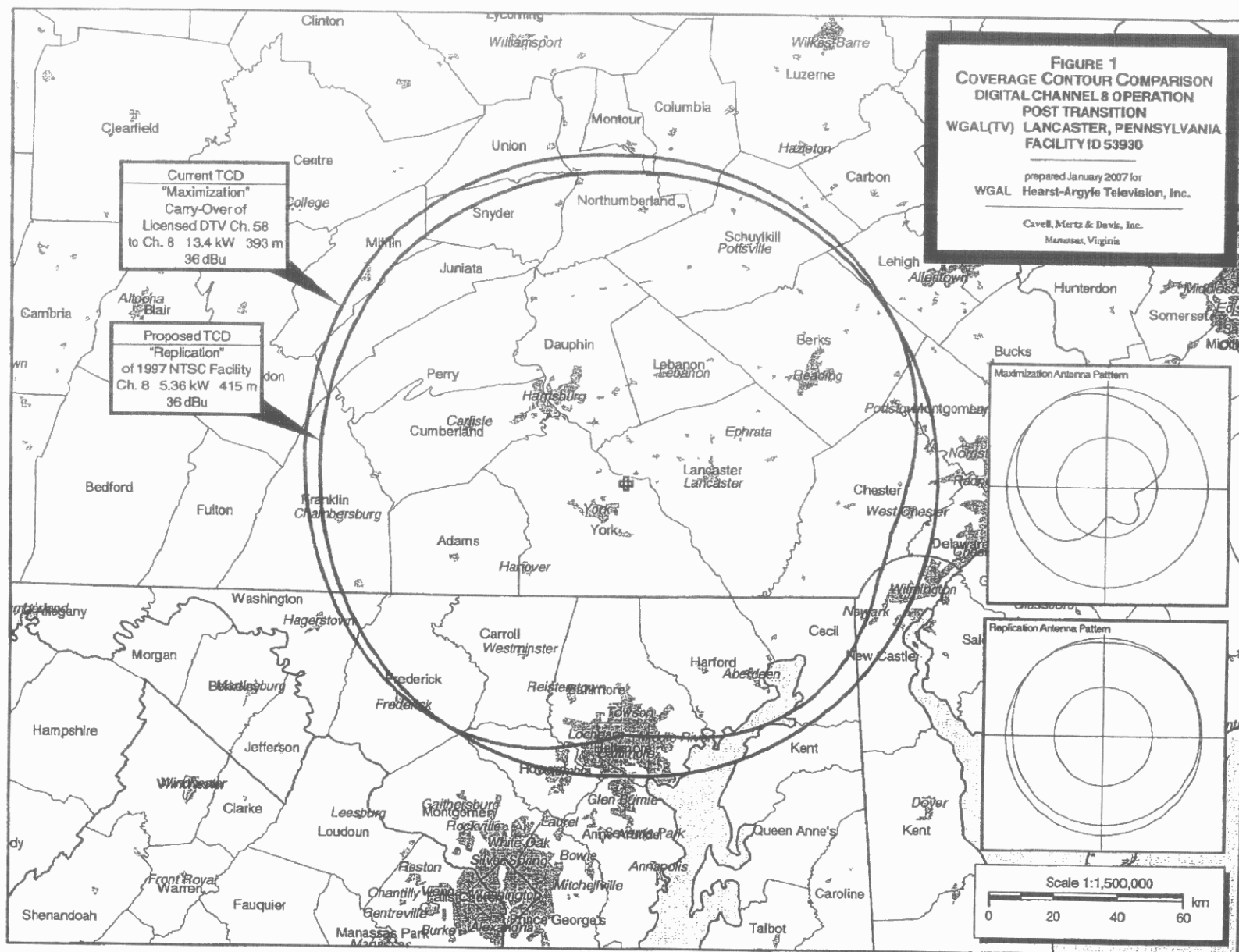
Joseph M. Davis, P.E.  
January 4, 2007

Cavell, Mertz & Davis, Inc.  
7839 Ashton Avenue  
Manassas, VA 20109  
703-392-9090

**List of Attachments**

Figure 1	Coverage Contour Comparison
Schedule B	Proposed TCD Facility Technical Parameters
Table 1	Interference Analysis Results Summary

**Cavell Mertz & Davis, Inc.**



**FCC 383****CONFLICT DECISION FORM SCHEDULE B****SCHEDULE FOR DTV ENGINEERING DATA**

Licenses seeking to resolve an interference conflict by reducing or otherwise modifying facilities must complete this Schedule. The purpose of this Schedule is for licensees/permittees to demonstrate how they will eliminate their interference conflict(s).

**TECHNICAL SPECIFICATIONS**

Ensure that the specifications below are accurate. All items must be completed. The response "on file" is not acceptable.

**TECH BOX**

1. Channel Number: 8
2. Zone: ☒ I ☐ II ☐ III
3. Antenna Location Coordinates: (NAD 27)
- |           |   |           |   |           |   |                                       |   |
|-----------|---|-----------|---|-----------|---|---------------------------------------|---|
| <u>40</u> | ° | <u>02</u> | ' | <u>04</u> | " | <input checked="" type="checkbox"/> N | <input type="checkbox"/> S Latitude             |
| <u>76</u> | ° | <u>37</u> | ' | <u>08</u> | " | <input type="checkbox"/> E            | <input checked="" type="checkbox"/> W Longitude |
4. Antenna Structure Registration Number: 1031756
- ☐ Not applicable ☐ FAA Notification Filed with FAA
5. Antenna Location Site Elevation Above Mean Sea Level: 318 meters
6. Overall Tower Height Above Ground Level: 228 meters
7. Height of Radiation Center Above Ground Level: 234 meters
8. Height of Radiation Center Above Average Terrain: 415 meters
9. Maximum Effective Radiated Power (average power): 5.36 kW
10. Antenna Specifications:
- | Manufacturer | Model | Replication WGAL |
|--------------|-------|------------------|
| REP          |       |                  |
- a. ☐ Not applicable ☒ Not Applicable
- b. Electrical Beam Tilt: \_\_\_\_\_ degrees ☒ Not Applicable
- c. Mechanical Beam Tilt: \_\_\_\_\_ degrees toward azimuth \_\_\_\_\_ degrees True ☒ Not Applicable
- Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.
- Exhibit No.
- d. Polarization: ☒ Horizontal ☐ Circular ☐ Elliptical

**TECH BOX**

e. Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)  
 Rotation: \_\_\_\_\_ ° ☒ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.948	60	0.982	120	0.943	180	0.895	240	0.920	300	0.985
10	0.957	70	0.980	130	0.932	190	0.899	250	0.924	310	0.999
20	0.965	80	0.979	140	0.918	200	0.901	260	0.928	320	1.000
30	0.974	90	0.977	150	0.907	210	0.906	270	0.932	330	0.991
40	0.982	100	0.965	160	0.903	220	0.910	280	0.949	340	0.978
50	0.984	110	0.954	170	0.899	230	0.918	290	0.969	350	0.964
Additional Azimuths											

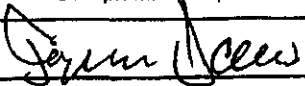
If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.682(a)(14) and 73.685 must be satisfied. Exhibit required.

Exhibit No. \_\_\_\_\_

**PREPARER'S CERTIFICATION MUST BE COMPLETED AND SIGNED.**

**PREPARER'S CERTIFICATION**

I certify that I have prepared Schedule B-DTV Engineering Data on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Joseph M. Davis, P.E.		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 		Date January 4, 2007	
Mailing Address Cavell, Mertz & Davis, Inc. 7839 Ashton Avenue			
City Manassas		State or Country (if foreign address) Virginia	ZIP Code 20109-2883
Telephone Number (include area code) (703) 392-9090		E-Mail Address (if available) jdavis@cmdconsulting.com	

**WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT  
 (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT  
 (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).**

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
**PROPOSED CHANNEL 8 PARAMETERS**

prepared for  
**WGAL Hearst-Argyle Television, Inc.**  
**WGAL(TV) Lancaster, Pennsylvania**  
**Facility ID 53930**

Ch	Call Sign Service	City/State File Number	Fac. ID	Latitude Longitude	Power HAAT	Distance Bearing	Baseline Population	New Interference Population	Percent
7	WJLA-TV DT	WASHINGTON, DC BPCDT-19990706KE	1051	38 57 01 77 04 47	14,979 254	126.7 198.3	7,044,041	0	0.00
8	WNJB DT	NEW BRUNSWICK, NJ BMPEDT-20000425AAM	48457	40 37 17 74 30 15	20.2 212	191.2 69.3	16,186,875	0	0.00
8	WWCP-TV DT	JOHNSTOWN, PA BFRCCCT-20050815ABA	20295	40 10 53 79 09 05	6.5 352	216.5 275.2	2,491,029	0	0.00
8	WICZ-TV DT	BINGHAMTON, NY BDTV-	62210	42 03 22 75 56 39	3.2 375	231.6 13.9	727,576	0	0.00
9	WBPH-TV DT	BETHLEHEM, PA BMPCDT-20030522ADF	60850	40 33 52 75 26 24	3.2 284	116.2 59.1	2,917,973	0	0.00
9	WUSA DT	WASHINGTON, DC BLCDT-20040206AAS	65593	38 57 01 77 04 47	17,016 254	126.7 198.3	7,079,245	0	0.00

**Cavell, Mertz & Davis, Inc.**

### Certificate of Service

The undersigned, of the law firm of Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P., hereby certifies that s/he has caused a copy of the foregoing **COMMENTS OF HEARST-ARGYLE TELEVISION, INC., KCWE LMA, INC. and WMOR-TV COMPANY** to be placed in the U.S. Mail, first-class postage prepaid, addressed as follows:

Mt. Mansfield Television, Inc.  
William R. Richardson, Jr.  
Wilmer Hale  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006

Roy Stewart  
Chief  
Office of Broadcast License Policy  
Media Bureau  
Federal Communications Commission  
445 12th Street, S.W., Room 2-C347  
Washington, D.C. 20554

Clay Pendarvis  
Associate Chief  
Video Division  
Media Bureau  
Federal Communications Commission  
445 12th Street, S.W., Room 2-A662  
Washington, D.C. 20554

This the 25th day of January, 2007.

Sandra S. Kieps





**EXHIBIT 2**  
**WYFF-DT Engineering Statement**

BERNARD R. SEGAL, P. E.  
CONSULTING ENGINEER  
KENSINGTON, MARYLAND

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ENGINEERING STATEMENT  
IN SUPPORT OF PETITION FOR RECONSIDERATION  
SEVENTH REPORT AND ORDER AND  
EIGHTH FURTHER NOTICE OF PROPOSED RULE MAKING  
MB DOCKET NO. 87-268

The instant Engineering Statement has been prepared on behalf of Hearst-Argyle Television, Inc. (hereafter, Hearst-Argyle), the parent company of the licensee of analog television Station WYFF and digital television Station WYFF-DT, Greenville, SC. The former station operates on Channel 4 with effective radiated power of 100 kW and antenna radiation center height of 610 meters above average terrain. The latter station operates on Channel 59 with effective radiated power of 1000 kW and antenna radiation center height above average terrain of 577 meters.

In the Seventh Report and Order and Eighth Further Notice of Proposed Rule Making in MB Docket No.87-268 (hereafter, 7th R & O), the FCC allotted WYFF-DT in-core Channel 36 with maximum effective radiated power of 664 kW and antenna radiation center height of 577 meters above average terrain in substitution for the out-of-core Channel 59 facilities. The Channel 36 facilities replicate the Channel 59 coverage according to the procedure described in the channel election process. Figure 1 shows the calculated WYFF, Channel 4, Grade B, contour and the WYFF-DT, Channel 36, noise-limited, 41 dBu contour for two modes of operation.

The first mode of WYFF-DT, Channel 36, operation is for the allotment replication facilities of 664 kW / 577 meters. The second mode of WYFF-DT, Channel 36, operation is for facilities of 1000 kW / 596 meters. Due to the maximum power limitation of 1000 kW that is imposed for UHF allotments in Section 73.622(f)(8) of the Rules and the differences in propagation characteristics between Channel 4 and Channel 59, replication of the Channel 4 contour coverage was not possible from the very outset of the transition process. Due to the constraint imposed by 73.622(f)(8) on power/height combinations that exceed the limits shown, absent a waiver, WYFF-DT will be foreclosed from ever achieving replication of its current Channel 4 contour coverage after

the conclusion of these initial allotments. The replication of the Channel 59 coverage on Channel 36 in the 7th R & O did not serve to improve replication of the Channel 4 coverage. The disparity in coverage of the first mode of operation, relative to that for the present Channel 4 analog facility, is readily apparent in Figure 1. However, operation of WYFF-DT on Channel 36 with 1000 kW / 596 meters will materially improve replication of the Channel 4 coverage.

In this Petition, Hearst-Argyle seeks reconsideration of the DTV Table of Allotments, Appendix B, allotment for WYFF-DT. Specifically, instead of the referenced first mode of Channel 36 operation (664 kW / 577 meters HAAT), Hearst-Argyle requests allotment to WYFF-DT of the referenced second mode of Channel 36 operation (1000 kW / 596 meters HAAT).

Using a Sunblade computer and the "tv\_process\_v12d\_03" algorithm with the 7th R & O, Appendix B, database, the undersigned has determined that with WYFF-DT operating on Channel 36 with 1000 kW ERP and antenna radiation center height of 596 meters above average terrain (1195 meters above mean sea level), no station would receive interference in excess of 0.1 %. The program was run with no changes in the FCC's standard settings. The antenna radiation center height of 1195 meters AMSL reflects the use of a top mounted UHF, Channel 36, non-directional antenna in substitution for the present analog, Channel 4, non-directional antenna at the end of the transition. The present Channel 59 antenna, with radiation center at 1173 m AMSL, is side-mounted on the tower.

An additional study was performed using the pre-transition station facility database, but focusing on interference caused to co-channel and first adjacent channel DTV stations as outlined in paragraphs 18 and 19 and footnotes 35 and 36 of the instant

proceeding to ascertain compliance with the 0.1 % additional interference limitation criterion. The study results confirmed compliance with the 0.1 % additional interference limitation criterion for the proposed WYFF-DT Channel 36 allotment of 1000 kW / 596 meters.

In support of Hearst-Argyle's petition, it is shown herein that the proposed operation (1) does not result in interference to any other allotment that exceeds the 0.1 % standard that has been used as the touchstone maximum limit for the vast majority of other allotments; (2) will not extend coverage in any direction beyond that for the present Channel 4 analog operation; (3) will provide better replication of the present analog operation than the Appendix B allotment of 664 kW / 577 meters; and (4) the FCC has already afforded similar facility improvements for other stations that effectively achieved the same objectives as sought herein for WYFF-DT. The discussions involving 30 stations in paragraphs 62 through 67 of the 7<sup>th</sup> R & O are, in particular, relevant in this regard.

Figure 2 compares the populations and areas for WYFF, as licensed on analog Channel 4; as proposed herein on Channel 36 with 1000 kW / 596 meters, and as set forth in Appendix B in the 7th R & O, i.e., on Channel 36, with 664 kW / 577 meters. The populations in Figure 2 are based on the 2000 Census.

From Figure 2, the Grade B contour for WYFF, Channel 4, that is not affected by terrain losses, includes 2,399,800 persons in 44,990 square kilometers. After taking into account interference, WYFF serves 2,060,700 persons in 37,920 square kilometers within the Grade B contour. It is apparent that the 664kW / 577 meter allotment facilities fail to replicate the Channel 4 facilities by 52,000 persons in 2,280 square kilometers.

In Support of Petition for Reconsideration

Seventh Report and Order and

Eighth Further Notice of Proposed Rule Making, MB Docket No. 87-268

On the other hand, the 1000 kW / 596 meter operation that is proposed herein for WYFF-DT, will provide net service to 123,200 more persons in 3,220 more square kilometers than will the 640 kW / 577 meter allotment. Also, the proposed 1000 kW / 596 meter facility will provide net service to 71,200 more persons in 940 more square kilometers than does the present analog Channel 4 operation, but without extending the coverage range in any direction (see Figure 1).

The foregoing demonstrates that the changes proposed for the WYFF-DT, Channel 36, allotment are fully compliant with the FCC's 0.1 % additional interference limit criterion and with past actions for service improvements that have been taken with regard to other similarly situated stations.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 4, 2007.

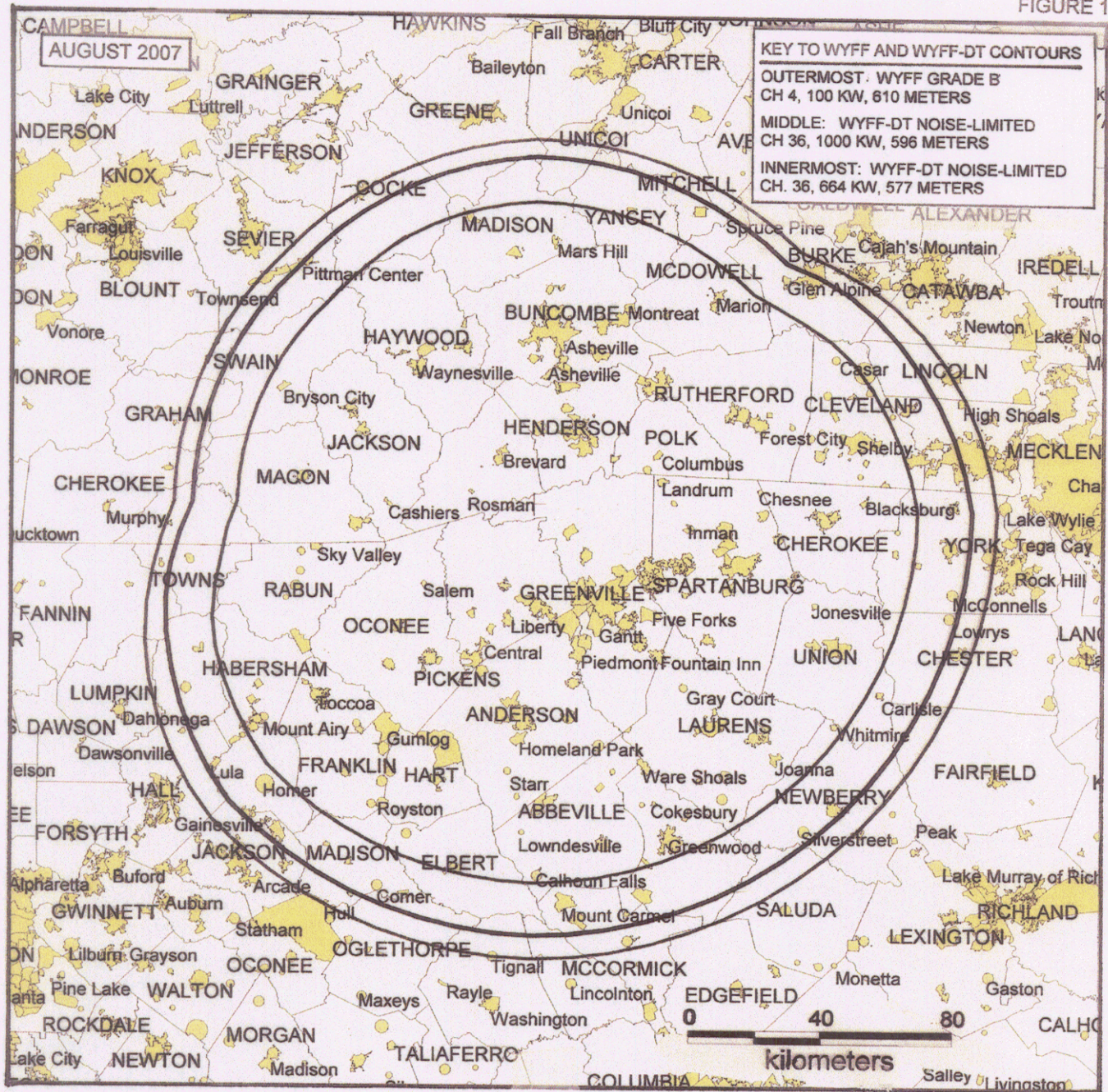


Bernard R. Segal, P. E.

Maryland Registration # 25811



FIGURE 1



### CALCULATED CONTOURS

WYFF HEARST-ARGYLE TELEVISION, INC.  
 WYFF(TV) AND WYFF-DT, GREENVILLE, SC

Bernard R. Segal, P. E. Consulting Engineer



BERNARD R. SEGAL, P. E.  
CONSULTING ENGINEER  
KENSINGTON, MARYLAND

FIGURE 2

POPULATION AND AREA SUMMARY FOR  
WYFF AND WYFF-DT CONTOURS FOR  
VARIOUS OPERATING MODES  
WYFF HEARST-ARGYLE TELEVISION, INC.  
GREENVILLE, SOUTH CAROLINA

	CHANNEL 4 100 KW, 610 Mtrs		CHANNEL 36 1000 KW, 596 Mtrs		CHANNEL 36 664 KW, 577 Mtrs	
	POP.	AREA	POP.	AREA	POP.	AREA
	(2000 Cens)	(km <sup>2</sup> )	(2000 Cens)	(km <sup>2</sup> )	(2000 Cens)	(km <sup>2</sup> )
Within Noise-Limited Contour	2,555,700	49,140	2,326,500	44,240	2,188,900	40,370
Not Affected By Terrain Losses	2,399,800	44,990	2,141,200	38,950	2,012,700	35,720
Lost Due To Interference	339,100	7,070	9,300	90	4,000	80
Net Service	2,060,700	37,920	2,131,900	38,860	2,008,700	35,640